

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|-------------------------------------|---|---------------------------------------|
| SABRINA FLOWERS, |) | |
| |) | |
| Plaintiff, |) | Case No. 08 C 00449 |
| |) | |
| v. |) | Hon. George M. Marovich |
| |) | |
| SOUTH WESTERN MOTOR SALES, INC. dba |) | Magistrate Judge Geraldine Soat Brown |
| TOYOTA SCION ON WESTERN and |) | |
| SANTANDER CONSUMER USA INC. dba |) | |
| DRIVE FINANCIAL SERVICES, |) | |
| |) | |
| Defendants. |) | |

NOTICE OF MOTION

TO: Keith James Keogh, Esq.
Alexander Holmes Burke
Law Offices of Keith J. Keogh
227 West Monroe Street, Suite 2000
Chicago, Illinois 60606

PLEASE TAKE NOTICE that on the 26th day of February, 2008 at 10:30 a.m., the undersigned shall appear before the George M. Marovich, or any Judge sitting in his stead, in Courtroom 1944-C of the United States District Court for the Northern District of Illinois, Eastern Division, located at 219 South Dearborn Street, Chicago, Illinois 60604, and then and there present the *Motion of Defendant, Santander Consumer USA Inc. dba Drive Financial Services, for Extension of Time to Answer or Otherwise Plead*, a copy of which was electronically filed on this date and is attached and hereby served upon you.

Respectfully submitted,
SANTANDER CONSUMER USA INC. dba
DRIVE FINANCIAL SERVICES,
Defendant,

David J. Frankel, Esq. (#6237097)
Sorman & Frankel, Ltd.
203 North LaSalle Street, Suite 2350
Chicago, Illinois 60601
(312)332-3535
(312)332-3545 (facsimile)

By: /s/ David J. Frankel
One of its attorneys

CERTIFICATION OF SERVICE

The undersigned certifies and states that I caused the foregoing Notice of Motion and Motion of Defendant, Santander Consumer USA Inc. dba Drive Financial Services, for Extension of Time to Answer or Otherwise Plead to be served upon the above-listed party(ies) by electronic filing and by placing a copy of same in an envelope, properly addressed, with proper postage affixed thereon, and depositing said envelope in the United States Mail located at 203 North LaSalle Street, Chicago, Illinois 60601, prior to 5:00 p.m. this 12th day of February, 2008.

_____/s/ David J. Frankel

SUBSCRIBED AND SWORN TO
before me this 12th day of February, 2008

_____/s/ Samantha Brand

NOTARY PUBLIC